

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>  <b>WOLLMUTH MAHER &amp; DEUTSCH LLP</b> Paul R. DeFilippo, Esq. 500 Fifth Avenue New York, New York 10110 Telephone: (212) 382-3300 Facsimile: (212) 382-0050 pdefilippo@wmd-law.com  <b>JONES DAY</b> Gregory M. Gordon, Esq. Brad B. Erens, Esq. Dan B. Prieto, Esq. Amanda Rush, Esq. 2727 N. Harwood Street Dallas, Texas 75201 Telephone: (214) 220-3939 Facsimile: (214) 969-5100 gmgordon@jonesday.com bberens@jonesday.com dbprieto@jonesday.com asrush@jonesday.com (Admitted <i>pro hac vice</i> )  <i>ATTORNEYS FOR DEBTOR</i>	
In re:  LTL MANAGEMENT LLC, <sup>1</sup>  Debtor.	Chapter 11  Case No.: 21-30589 (MBK)  Judge: Michael B. Kaplan

**SUPPLEMENTAL CERTIFICATION OF ROBERT LOEB  
IN SUPPORT OF APPLICATION FOR RETENTION OF  
ORRICK, HERRINGTON & SUTCLIFFE LLP AS SPECIAL  
APPELLATE COUNSEL, EFFECTIVE AS OF APRIL 4, 2023**

I, Robert Loeb, being of full age, certify as follows:

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

1. Through the Application, the Debtor seeks authorization to retain Orrick as special appellate counsel in this Chapter 11 Case. I make this certification in support of Application for the same.<sup>2</sup>

2. My professional credentials include being admitted and in good standing to practice in the District of Columbia and before the United States Supreme Court, the United States District Court for the District of Columbia, and every United States Courts of Appeals.

3. I am a partner at Orrick and am duly authorized to make this supplemental certification on behalf of Orrick.

4. On May 4, 2023, the Debtor filed the Application to retain Orrick in this Chapter 11 Case [Dkt. 430]. In response to the Application, the United States Trustee (“Trustee”) has requested a supplemental certification providing additional information regarding the Application. Orrick provides the information herein in response to the Trustee’s request.

5. With respect to the Payment of \$586,215.87 that Orrick received on April 4, 2023 from the Debtor, see Appl. ¶ 6, this amount is comprised of (a) \$518,215.87 on account of actual and estimated fees and expenses for which the Debtor was responsible and that were incurred but not yet paid in the 2021 Chapter 11 Case through the entry of the Dismissal Order (the “Pre-Dismissal Amounts”) and (b) \$68,000 for Orrick’s estimated fees and expenses incurred following dismissal of the 2021 Chapter 11 Case and prior to the commencement of this Chapter 11 Case (the “Post-Dismissal Amounts”). As of the date of this supplemental certification, Orrick is still holding \$71,274.42 that has not been applied, which amount is composed of \$3,274.42 from the Pre-Dismissal Amounts and the entire Post-Dismissal Amounts. Of the Pre-Dismissal Amounts, \$514,941.43 has been applied, of which \$254,266.20 was for services to the Debtor and \$260,675.23 was for services to J&J.

6. Since May 19, 2022, Orrick has billed J&J a total of \$1,597,815.64. J&J has paid \$1,331,207.18 and \$260,675.23 was billed to J&J and paid by the Debtor as described in paragraph 5. The current amount due from J&J is \$677.07.

7. With respect to information requested pursuant to paragraph D.1 of the U.S. Trustee Large Case Fee Guidelines, Orrick submits the following:

- (i) Other than the billing rates described herein, the material terms of this engagement are substantially similar to the terms of Orrick’s engagement in the 12 months prepetition. Accordingly, the rates Orrick charges in this Chapter 11 Case are the same as those it charged the Debtor from January 1, 2023 until the dismissal of the 2021 Chapter 11 Case: (a) \$375 for paralegals (b) \$536-\$844 for associates; and (c) \$876-\$1,200 for partners and of counsel. The current fee structure is a continuation of the fee structure Orrick adopted after discussions with the Fee Examiner in the 2021 Chapter 11 Case. See Supp. Decl. of Robert Loeb Relating to Appl. for

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<sup>2</sup> Capitalized terms used herein but not defined shall have the meaning given to such terms in the Application and the materials attached thereto.

*Retention of Orrick, Herrington & Sutcliffe LLP as Special Talc Litigation Appellate Counsel, Effective Oct. 14, 2021, In re LTL Mgmt. LLC*, No. 21-30589 (MBK), Dkt. 3088.

- (ii) The professionals included in this engagement do not vary their rate based on the geographic location of the bankruptcy case.
- (iii) Orrick has represented the Debtor in the 12 months prepetition in connection with the 2021 Chapter 11 Case. The rates Orrick charged in the 2021 Chapter 11 Case are as follows: from January 1, 2023 until dismissal (a) \$375 for paralegals (b) \$536-\$844 for associates; and (c) \$876-\$1,200 for partners and of counsel; from June 1, 2022 until December 31, 2022 (a) \$235-\$530 for paralegals; (b) \$610-\$1,025 for associates; and (c) \$905-\$1,750 for partners and of counsel; and from Orrick's retention until May 31, 2022: (a) \$225-\$530 for paralegals; (b) \$570-\$1,025 for associates; and (c) \$805-\$1,750 for partners and of counsel. Additional terms of Orrick's engagement are reflected in filings in the 2021 Chapter 11 Case. See *In re LTL Mgmt. LLC*, No. 21-30589 (MBK), Dkts. 1456, 3088, and 3889.
- (iv) Orrick has not provided the Debtor with prospective budget and staffing plans during either this Chapter 11 Case or the 2021 Chapter 11 Case.

8. The following individuals have worked on this Chapter 11 Case and/or the 2021 Chapter 11 Case and either are working on the case currently or may do so in the future.

<i><b>Name</b></i>	<i><b>Hourly Rate</b></i>
Peter A. Bicks	\$1,200
Stacy W. Harrison	\$1,200
Robert Loeb	\$1,200
Rob McKenna	\$1,200
Brian T. Moran	\$1,200
Joshua Rosenkranz	\$1,200
Lisa T. Simpson	\$1,200
James L. Stengel	\$1,200
Meghan Kelly	\$980
C. Anne Malik	\$910
Libby Moulton	\$910
Naomi J. Scotten	\$910
Siobhan Atkins	\$844
Alyssa Barnard-Yanni	\$844
Sheila Anne Baynes	\$844
Upnit K. Bhatti	\$844
Max Carter-Oberstone	\$844
Melanie Robin Hallums	\$844
Jodie Liu	\$844

Paul David Meyer	\$844
Natalie Nahabet	\$844
Mariya Naulo	\$844
Paige Pavone	\$844
Jeff Quilici	\$844
Brian Raphel	\$844
Anne Savin	\$844
Geoffrey Shaw	\$844
Sarah Sloan	\$844
Vincent Chanhong Yiu	\$844
Olivia Helen Clements	\$807
Lauren A. Weber	\$807
Zachary Hennessee	\$756
Darren Pouliot	\$756
Ayala Magder	\$644
Deborah Ann Abernathy	\$522
Amy S. Gerrish	\$375
Patrick Kunkler	\$375
Youske Okano	\$375
Elizabeth Y. Walker	\$375

I certify under penalty of perjury that the above information is true.

Date: June 16, 2023

/s/ Robert Loeb

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